



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

May 8, 2025

BY ECF

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States of America v. LabQ Clinical Diagnostics, LLC, et al.*
No. 22 Civ. 751 (LJL), No. 22 Civ. 10313 (LJL)

Dear Judge Liman:

This Office represents the United States of America in this False Claims Act case. We write respectfully, with Defendants' consent, to request a one-week extension of time for the Government to file its amended complaint in this case. As the Government has previously informed the Court and Defendants, the Government intends to file an amended complaint and name as defendants additional entities and an additional individual that each received transfers of funds from Defendants after Defendants learned of the Government's False Claims Act investigation (the "Additional Defendants"). *See* Dkt. No. 355.

Today, counsel for four Additional Defendants contacted the Government. This counsel represented that they had been retained yesterday by these four Additional Defendants, and requested the Government seek an extension of time to file the amended complaint so that counsel for these Additional Defendants can hold further discussions with the Government. The Government is requesting a one-week extension of time to provide these Additional Defendants with an opportunity to confer with the Government. In addition, the Government is in the process of finalizing the amended complaint.

This is the Government's fourth request for an extension of this deadline. The parties' next scheduled appearance before the Court is presently scheduled for July 15, 2025. As previously noted, discovery remains ongoing in this case and the Government does not anticipate that adding the Additional Defendants as defendants will meaningfully change the scope of discovery in this action.

A proposed revised schedule is as follows:

	Current Deadline	Proposed New Deadline
Government's Deadline to File an Amended Complaint or file an Opposition Brief to Defendants' motion to dismiss the Complaint.	May 12, 2025	May 19, 2025
Defendants' Deadline to Respond to the Amended Complaint	June 16, 2025	June 23, 2025
Government's Deadline to File an Opposition Brief (if Defendants file a motion to dismiss the Government's Amended Complaint)	July 21, 2025	July 28, 2025
Defendants' Deadline to File a Reply Brief (if Defendants file a motion to dismiss the Government's Amended Complaint)	August 11, 2025	August 18, 2025

We thank the Court for its consideration of this request.

Respectfully,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Charles S. Jacob
ZACHARY BANNON
RACHAEL DOUD
LAWRENCE H. FOGELMAN
CHARLES S. JACOB
MOLLIE KORNREICH
DANIELLE J. MARRYSHOW
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, NY 10007
Telephone: (212) 637-2800
Email: zachary.bannon@usdoj.gov
rachael.doud@usdoj.gov
lawrence.fogelman@usdoj.gov
charles.jacob@usdoj.gov
mollie.kornreich@usdoj.gov
danielle.marryshow@usdoj.gov

cc: Counsel of Record (by ECF)